

UNITED STATES DISTRICT COURT  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
EASTERN DISTRICT - WI  
FILED

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UNITED STATES OF AMERICA, 2019 JUN -4 P 2:39

Plaintiff, STEPHEN C. DRIES  
CLERK

**19-CR-103**

v.

Case No. 19-CR-

[18 U.S.C. §§ 1591, 1594(c), 2421(a),  
922(g)(1), and 924(a)(2)]

CALVIN C. FREEMAN,

Defendant.

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**INDICTMENT**

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**COUNT ONE**  
**(Conspiracy to Engage in Sex Trafficking)**

**THE GRAND JURY CHARGES THAT:**

Beginning by at least August 2015, and continuing through October 7, 2018, in the State and Eastern District of Wisconsin, the State and District of Nevada, the State and Northern District of Illinois, the State and Eastern District of Louisiana, the State and Central District of California, the State and Northern District of Ohio, and elsewhere,

**CALVIN C. FREEMAN**

conspired and agreed with persons known and unknown to the Grand Jury, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, female victims, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the victims to engage in commercial sex acts in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

In violation of Title 18, United States Code, Section 1594(c).

**COUNT TWO**  
**(Sex Trafficking by Force, Fraud, or Coercion)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning in approximately August 2015, and continuing until October 7, 2018, in the State and Eastern District of Wisconsin, the State and District of Nevada, the State and Northern District of Illinois, the State and Eastern District of Louisiana, the State and Central District of California, the State and Northern District of Ohio, and elsewhere,

**CALVIN C. FREEMAN,**

in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit by any means AV-1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause AV-1 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

**COUNT THREE**  
**(Interstate Transportation for Prostitution)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between approximately October of 2017 and February of 2018, in the State and Eastern District of Wisconsin, the State and District of Nevada, the State and Northern District of Illinois, and elsewhere,

**CALVIN C. FREEMAN**

did knowingly transport AN individual, AV-1, in interstate commerce between Las Vegas, Nevada, Chicago, Illinois, and Milwaukee, Wisconsin, with the intent that AV-1 engage in prostitution.

In violation of Title 18, United States Code, Section 2421(a).

**COUNT FOUR**  
**(Interstate Transportation for Prostitution)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between March 13, 2018 and May 3, 2018, in the State and Eastern District of Wisconsin, the State and Northern District of Illinois, the State and Eastern District of Louisiana, and the State and District of Nevada, and elsewhere,

**CALVIN C. FREEMAN**

did knowingly transport an individual, AV-1, in interstate commerce, between Las Vegas, Nevada, Chicago, Illinois, New Orleans, Louisiana, and Milwaukee, Wisconsin, with the intent that AV-1 engage in prostitution.

In violation of Title 18, United States Code, Section 2421(a).

**COUNT FIVE**  
**(Interstate Transportation for Prostitution)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between approximately September of 2018 and October of 2018, in the State and Eastern District of Wisconsin, the State and District of Nevada, and elsewhere,

**CALVIN C. FREEMAN**

did knowingly transport an individual, AV-1, in interstate commerce, from Las Vegas, Nevada to Milwaukee, Wisconsin, with the intent that AV-1 engage in prostitution.

In violation of Title 18, United States Code, Section 2421(a).

**COUNT SIX**  
**(Possession of a Firearm by a Felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about October 7, 2018, in the State and Eastern District of Wisconsin,

**CALVIN C. FREEMAN,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Beretta, model PX4 Storm, semi-automatic handgun, bearing serial number PZ4272B.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT SEVEN**  
**(Possession of Ammunition by a Felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about October 10, 2018, in the State and Eastern District of Wisconsin,

**CALVIN C. FREEMAN,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The ammunition is more fully described as a 31-round Glock magazine containing 10 unfired Luger 9mm hollow point cartridges and 10 unfired Luger 9mm round point cartridges.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT EIGHT**  
**(Obstruction of Sex Trafficking Enforcement)**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between approximately May 21, 2019 and June 3, 2019, in the State and Eastern District of Wisconsin, the State and District of Nevada, and elsewhere,

**CALVIN C. FREEMAN,**

did knowingly obstruct, attempt to obstruct, interfere with, and prevent the enforcement of Title 18, United States Code, Section 1591.

In violation of Title 18, United States Code, Section 1591(d).

## **FORFEITURE NOTICE**

1. Upon conviction of one or more offenses in violation of Title 18, United States Code, Section 1591 or Section 1594, set forth in Counts One and Two of this Indictment, the defendant, CALVIN C. FREEMAN, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594, any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to:

- a. a 1999 Bounder motorhome, VIN 3FCNF53S5XJA20459, bearing Nevada license plate LVA83N;
- b. a 1982 Rolls Royce Silver Spirit 4-door sedan, black in color, VIN SCAZS42A0CCX05177, bearing Wisconsin license plate 416-SLJ;
- c. a 2007 Chevrolet HHR LT, red in color, VIN 3GNDA23D77S623411, bearing Nevada license plate 613-F02;
- d. the real property located at 4353 N. 25th Street in Milwaukee, Wisconsin; and
- e. a sum of money equal to the proceeds obtained from the offense or offenses of conviction.

2. Upon conviction of one or more offenses in violation of Title 18, United States Code, Section 2421(a), set forth in Counts Three through Five of this Indictment, the defendant, CALVIN C. FREEMAN, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2428, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense. The property to be forfeited includes, but is not limited to:

- a. a 2007 Chevrolet HHR LT, red in color, VIN 3GNDA23D77S623411, bearing Nevada license plate 613-F02; and
- b. a sum of money equal to the proceeds obtained from the offense or offenses of conviction.

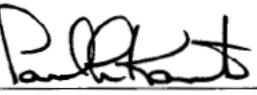
3. If any of the property described above, as a result of any act or omission by a defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, including but not limited to the real property located at 2474 West Keefe Avenue in Milwaukee Wisconsin, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

Dated: 6/4/19

  
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MATTHEW D. KRUEGER  
United States Attorney